



November 22, 2016

via electronic submission

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Inadvertent and NSI Device Calls to 911
PS Docket Nos. 08-51, 11-153, and 14-193**

Dear Ms. Dortch,

Nonemergency 911 calls are a serious problem for Public Safety Answering Points (PSAP) across the country. We believe that an analysis of the various sources of non-emergency 911 calls may facilitate a greater understanding of how to address each individual cause of non-emergency 911 calls, and help the Commission reach better decisions in the above-referenced dockets.

In collaboration with the National 911 Program, the Samuelson-Glushko Technology Law & Policy Clinic has attempted to better quantify and explain the various sources of nonemergency calls to PSAPs. Our comment discusses the issues related to non-service initialized (NSI) devices, what actions can be taken to reduce the risk posed by the large number of NSI devices currently in circulation, and how these might impact the populations that depend on NSI devices to maintain access to emergency services. Additionally, we examined the 911 “pocket dial” phenomenon, the problems that result from large influxes of non-emergency calls to PSAPs, the various causes likely contributing to the high percentages of non-emergency 911 calls PSAPs receive, and an exploration of potential solutions aimed at combatting those causes.

Respectfully submitted,

/s/

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